

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DREW DIXON,

Plaintiff,

Case No.: 1:23-cv-09878-JAV

v.

ANTONIO MARQUIS “L.A.” REID,

Defendant.

/

THIRTEENTH JOINT DISCOVERY STATUS REPORT

Pursuant to the Court’s Civil Case Management Plan and Scheduling Order (Dkt. 21) (“Notice”), counsel for Plaintiff Drew Dixon and Defendant Antonio Marquis “L.A.” Reid respectfully submit their thirteenth monthly Joint Discovery Status Report updating the Court on the parties’ progress in discovery as of March 3, 2025.

THIRTEENTH DISCOVERY REPORT

A. Status of Discovery

a. Written Discovery

- i. No additional written discovery requests have been propounded at this time.

b. Rule 45 Subpoenas

- i. No additional written discovery requests have been propounded at this time.

c. Discovery Production

i. Plaintiff's Productions

1. Besides responding to Defendant's requests for specific documents, Plaintiff's document production is complete.

ii. Defendant's Productions

1. Defendant's production is complete, except to the extent that the forensic process being undertaken by the parties (as previously discussed with the Court) uncovers any previously-unproduced, responsive documents.

d. Depositions

- i. The deposition of Marc Plotkin (Plaintiff Expert) was taken on February 7, 2024.

- ii. The deposition of Dr. Chitra Raghavan (Plaintiff Expert) was rescheduled to March 17, 2025.

e. Experts

- i. Plaintiff has retained expert witnesses.
- ii. Defendant has not yet retained expert witnesses.

B. Discovery Issues

- a. Plaintiff's Position: On February 12, 2025, Defendant's counsel informed Plaintiff's counsel that Kroll, the vendor handling the forensic scan of Defendant's devices, was making progress with the processing of Defendant's devices. The parties are currently finalizing the search terms that will be run on the data from Defendant's devices.

- b. Defendant's Position: Same.

C. Discovery Orders

- a. None at this time.

D. Discovery Motions

- a. None at this time.

E. Ongoing Settlement Efforts

- a. No update.

DATED: March 3, 2025

Respectfully submitted,

/s/ Kenya K. Davis

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CERTIFICATE OF SERVICE

I certify that on March 3, 2025, I electronically served *Thirteenth Joint Discovery Status Report* via ECF to all counsel of record.

/s/ Kenya K. Davis
Kenya K. Davis

Counsel for Plaintiff Drew Dixon